

WGR Operating, LP

January 22, 2019

United States Environmental Protection Agency
Submitted via CEDRI

**RE: NSPS Subpart OOOOa, Semi-Annual Report
Hilight Gas Plant, Permit TV 3-3-030**

To Whom It May Concern:

WGR Operating LP (WGR) is hereby submitting the semi-annual monitoring report for Hilight Gas Plant as required by NSPS Subpart OOOOa. The reporting period is from January 1 – June 30, 2018. This report includes all leak and monitoring reports as required by Subpart OOOOa.

Shutdowns that occurred during the reporting period are listed in the table below:

<u>Process Unit</u>	<u>Shutdown</u>	<u>Startup</u>	<u>Duration (Days)</u>
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
TRAIN 2 (partial process unit)	7/20/2018	7/20/2018	1

The components reported as “added” or “removed” in the enclosed report represent changes made to the LDAR database that houses the LDAR-subject equipment inventory at Hilight Gas Plant. These changes were made during internal audits/reviews of the database.

During the reporting period, 1 valve and 2 connectors were added to the LDAR program and therefore added to the LDAR database. During the reporting period, database records were created for this equipment, and monitoring was initiated immediately. Because this equipment was existing (not newly physically added to the facility during the reporting period) and monitoring was not previously completed in full compliance with Subpart OOOOa, monitoring deviations are being reported in this report and the accompanying Title V compliance reports.

If you have any questions or need further information, please contact me at (720) 929-6075 or David.Steger@Anadarko.com.

Sincerely,

David Steger
Sr. HSE Representative